



VIA ECF

September 20, 2024

Hon. Ronnie Abrams
United States District Court Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Pauwels v. The Bank of New York Mellon Corp.*, No. 19-CV-02313

Dear Judge Abrams,

Both Plaintiff and Defendants jointly submit this letter motion pursuant to Rules 1(A) and 1(D) of Your Honor's Individual Rules & Practices in Civil Cases. Specifically, the parties are filing this letter motion to respectfully request that the Court adjourn the October 4, 2024 telephonic conference to the following week (October 7 to October 11) for a date and time on which counsel for both parties are available (as indicated below).

The October 4 date for the conference was set after the Court moved the end of expert discovery in this matter to September 30, 2024 [Dkt. 148]. Unfortunately, an unavoidable conflict has now arisen for Plaintiff's counsel and they are no longer able to participate at any time on October 4, 2024. After meeting and conferring, the parties agreed to submit this short letter motion to request a brief adjournment of the conference date.

Counsel for the parties have also conferred as to their availability for the week of October 7; the parties' counsel are all available on the following dates and times: (i) on the morning October 7, (ii) on October 8 either in the morning before 10:30 am or after 1:30 pm in the afternoon, and (iii) the morning of October 11.

Because good cause exists to adjourn the conference, because the parties agree to adjourn the conference to the following week, and because this is the first request to adjourn this conference, the parties hereby jointly and respectfully request that the Court adjourn the October 4 conference to a day the following week (October 7 to October 11), with preference for the times and dates on which the parties' counsel are both available. However, if Your Honor is not available during any of these times, we respectfully request an opportunity to discuss availability with the Deputy Clerk to determine a time that works for the Court and all counsel.

We thank the Court for its consideration of this request.

Application granted. The conference is hereby adjourned to October 11, 2024 at 11:00 a.m. SO ORDERED.

A handwritten signature in blue ink, appearing to be "R. Abrams", is written over a horizontal line.

Hon. Ronnie Abrams
U.S. District Judge
September 23, 2024

Respectfully Submitted,

/s/ Joshua I. Schiller
Joshua I. Schiller
Counsel for Plaintiff

/s/ Michael L. Banks
Michael L. Banks
Counsel for BNYM